

From: [Convery, Christine](#)
To: [Schulze, Chad](#)
Cc: [Bingham, Kimberly](#); [Dickens, Aquanetta](#); [Amend, Carol](#); [Pennamon, Shanieka](#)
Subject: FW: Oregon Pesticides Advisory - Misbranded / Adulterated Product, Statewide Stop Sale Distribution Order
Date: Monday, May 13, 2019 2:21:05 PM
Attachments: (b) (5) .pdf
[Analytical Report for Triple Action Neem Oil \(/U051-2-829\).pdf](#)
[ODA SSURO 2-14-2019.pdf](#)
[ODA Public Notice 2-14-2019.pdf](#)

Hi Chad,

Hope all is well.

The Pennsylvania Dept of Ag analyzed TRIPLE ACTION NEEM OIL (EPA Reg. No. 70051-2-829; EPA Est. No. 829-FL-1) which was collected from a Home Dept in Mechanicsburg, PA. The PDA lab found Malathion, chlorpyrifos and permethrin in the sample. The report (dated 5/9/19) shows these chemicals as "detected" so I've touched base with PDA to determine if they have actual levels (PPM). I'm awaiting their response.

In the meantime, I'm wondering if you ended up having a call with Kimberly about this and what, if anything has transpired since the chain of emails below.

I see that the Registrant for this product is located in Maryland, and I'm wondering if a SSURO has already been discussed for the Registrant (at least for the batches we know are involved so far)? The Lot # for the PDA sample was 31118030.

Can you please give me a call at your earliest convenience?

Thanks,

Christine

Christine Convery

Compliance and Enforcement Officer | FIFRA Section 7 Coordinator

Toxics Section (3ED23) | EPA Region 3

1650 Arch Street | Philadelphia, PA 19103

Phone: 215-814-2249

From: El-Abdaoui, Fatima

Sent: Monday, May 13, 2019 1:51 PM

To: Convery, Christine <Convery.Christine@epa.gov>

Cc: Amend, Carol <amend.carol@epa.gov>; Dickens, Aquanetta <Dickens.Aquanetta@epa.gov>; Townsend, Kyla <Townsend.Kyla@epa.gov>; Finn, Cara <Finn.Cara@epa.gov>

Subject: FW: Oregon Pesticides Advisory - Misbranded / Adulterated Product, Statewide Stop Sale Distribution Order

Hi, Christine:

HQ and Region 4 were involved in this matter. HQ was to check with OGC and get back to Region 4 and us. So, please check with them.

As you can see below, when I received the referral, I had informed Chad and Kimberly that AQ and Carol will be the new contacts for FIFRA enforcement, so information may have been redirected to them

Also, we can refer this to MD so that they can issue Stop Sale to the company for their state. They can do it on the spot while we issue ours. Just a thought!

Fatima El Abdaoui, Ph.D., Chief

Chemicals Safety Programs Branch

Land, Chemicals and Redevelopment Division

EPA Region III, 3LD40
1650 Arch Street
Philadelphia, PA 19103-2029
Tel: (215) 814-2129
Fax: (215) 814-3113
El-Abdaoui.Fatima@EPA.GOV

From: El-Abdaoui, Fatima
Sent: Thursday, March 14, 2019 11:06 AM
To: Schulze, Chad <Schulze.Chad@epa.gov>; Bingham, Kimberly <Bingham.Kimberly@epa.gov>
Cc: Terada, Derrick <Terada.Derrick@epa.gov>; Beard, Phillip <Beard.Phillip@epa.gov>; amend, carol <amend.carol@epa.gov>; Dickens, Aquanetta <Dickens.Aquanetta@epa.gov>
Subject: RE: Oregon Pesticides Advisory - Misbranded / Adulterated Product, Statewide Stop Sale Distribution Order
Hi, Chad

Thank you for the referral and the heads-up. However, I would like to let you know that effective March 17, Region 3 will be realigned to the new structure. The FIFRA enforcement will have new management: Aquanetta Dickens, Section Chief and Carol Amend, Branch Chief. Please include them in any FIFRA enforcement communication/meeting moving forward.

Thank you. Please let me know if you have any questions.

Fatima El Abdaoui, Ph.D., Chief

Pesticides & Asbestos Programs Branch
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1650 Arch Street
Philadelphia, PA 19103-2029
Tel: (215) 814-2129
Fax: (215) 814-3113
El-Abdaoui.Fatima@EPA.GOV

From: Schulze, Chad
Sent: Thursday, March 14, 2019 10:50 AM
To: Bingham, Kimberly <Bingham.Kimberly@epa.gov>; El-Abdaoui, Fatima <El-Abdaoui.Fatima@epa.gov>
Cc: Terada, Derrick <Terada.Derrick@epa.gov>; Beard, Phillip <Beard.Phillip@epa.gov>
Subject: RE: Oregon Pesticides Advisory - Misbranded / Adulterated Product, Statewide Stop Sale Distribution Order

Agreed!

I will set up a call so we all can touch base ... stay tuned for a meeting invite ...

Sincerely,

Chad

Chad Schulze

Pesticide Enforcement Team Lead

Pesticide and Toxics Unit

Office of Compliance and Enforcement

EPA Region 10

1200 6th Ave, Suite 155

Seattle, WA 98101

206-553-0505 (ph)

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schulze.chad@epa.gov

<https://www.epa.gov/pesticide-contacts/region-10-pesticide-program-and-contacts>

EPA DIVE UNIT:

<https://www.epa.gov/scientific-diving> or <https://www.epa.gov/diving>

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From: Bingham, Kimberly

Sent: Thursday, March 14, 2019 6:42 AM

To: Schulze, Chad <Schulze.Chad@epa.gov>; El-Abdaoui, Fatima <El-Abdaoui.Fatima@epa.gov>

Cc: Terada, Derrick <Terada.Derrick@epa.gov>; Beard, Phillip <Beard.Phillip@epa.gov>

Subject: RE: Oregon Pesticides Advisory - Misbranded / Adulterated Product, Statewide Stop Sale Distribution Order

It would be helpful to a call to discuss next steps? KLB

Kimberly L. Bingham, MPH | Chief, Pesticides Section | Chemical Safety and Enforcement Branch
Air, Pesticides and Toxics Management Division | U.S. Environmental Protection Agency Region 4
61 Forsyth Street, SW Atlanta, GA 30303 | Voice: **404-562-9038** | Email: bingham.kimberly@epa.gov

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From: Schulze, Chad

Sent: Wednesday, March 13, 2019 5:52 PM

To: Bingham, Kimberly <Bingham.Kimberly@epa.gov>; El-Abdaoui, Fatima <El-Abdaoui.Fatima@epa.gov>

Cc: Terada, Derrick <Terada.Derrick@epa.gov>; Beard, Phillip <Beard.Phillip@epa.gov>

Subject: FW: Oregon Pesticides Advisory - Misbranded / Adulterated Product, Statewide Stop Sale Distribution Order

Hi Kimberly and Fatima!

Hope you two are well!

The Oregon Department of Agriculture (ODA) has been working extremely hard in tracking down products that are contaminated with multiple other active ingredients. Recently, they identified a supplemental product called, TRIPLE ACTION NEEM OIL (EPA Reg. No. 70051-2-829; EPA Est. No. 829-FL-1), that contained the undisclosed contaminants malathion, chlorpyrifos, and permethrin. The company is called Southern Agricultural Insecticides, Inc. out of Palmetto, Florida. The Registrant is Certis USA, LLC out of Columbia, Maryland.

(b) (5)

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Thank you and please let me know if you have any questions.

Sincerely,

Chad

Chad Schulze

Pesticide Enforcement Team Lead

Pesticide and Toxics Unit

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<https://www.epa.gov/pesticide-contacts/region-10-pesticide-program-and-contacts>

EPA DIVE UNIT:

<https://www.epa.gov/scientific-diving> or <https://www.epa.gov/diving>

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From: Dale Mitchell <dmitchell@oda.state.or.us>

Sent: Tuesday, February 26, 2019 3:10 PM

To: Andy Zimmerman <azimmerman@oda.state.or.us>; Sunny Summers
<ssummers@oda.state.or.us>; Rose Kachadoorian <rkachadoorian@oda.state.or.us>

Cc: Stephanie A Page <spage@oda.state.or.us>; gjackson@oda.state.or.us; Schulze, Chad
<Schulze.Chad@epa.gov>; Liu, Linda <Liu.Linda@epa.gov>; Schultz, Tim (AGR)
<TSchultz@agr.wa.gov>; Weisshaar Rachel <rachel.weisshaar@state.or.us>

Subject: Fwd: Oregon Pesticides Advisory - Misbranded / Adulterated Product, Statewide Stop Sale
Distribution Order

Andy, Rose, Sunny

As we have done with previous Pesticides Advisories for misbranded / adulterated pesticides
products, please send out to your list serves.

Andy, please add to ODA Pesticides Program Web Pages (Pesticides, Cannabis)

Grant, please remove product from ODA Cannabis.

Sunny, please send to your client list.

Thank you for your

Begin forwarded message:

From: mailx@oda.state.or.us

Subject: Attached Image

Date: February 26, 2019 at 2:43:44 PM PST

To: "Mitchell" <dmitchell@oda.state.or.us>

